

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a  
Washington Public Corporation; Eliza  
Saunders, Director of the Office of Public  
Records, in her personal and official  
capacity; Alison Swenson, Compliance  
Analyst, in her personal capacity; Perry  
Tapper, Public Records Compliance  
Officer, in his personal capacity; Andrew  
Palmer, Compliance Analyst, in his  
personal capacity; John or Jane Does 1-12,  
in his or her personal capacity,

Defendants.

No. 2:17-cv-00642-MJP

UPDATED JOINT STATUS REPORT – RE:  
DOCKET 88

Pursuant to this Court’s April 26, 2018 Minute Entry [Dkt. 88], the parties hereby submit  
their Joint Status Report.

**1. Parties Have Met and Conferred**

The parties have conferred regarding discovery in this case pursuant to the Minute Order  
issued in Docket 88 by this Court.

As a preliminary issue, both parties have agreed to withdraw their pending motions or alternatively the Court may strike the motions *sua sponte*.

Plaintiff's Position: Plaintiff will voluntarily withdraw the two pending discovery motions [Dkt. Nos. 52 and 59]. Based upon the agreement with Defendants, discovery will start over. To clarify the current state of discovery Plaintiff will serve new discovery requests upon Defendants. Plaintiff may rely upon evidence already filed with this Court in this case.

Defendants' Position: Defendant University of Washington will voluntarily withdraw its pending motion for summary judgment [Dkt. No. 27] with the intent to file updated dispositive motions addressing the Amended Complaint at the appropriate time. When Defendants file future dispositive motions, they may rely on some of the declarations and evidence already filed, particularly those that remain under seal.

## 2. Issue of Amended Discovery Motion

Both parties agree that instead of an amended discovery motion it will be more efficient to start over to issue new discovery requests that more meaningfully addresses the specific claims before this Court.

Plaintiff's Position: Plaintiff has concerns regarding moving forward with discovery expeditiously. **First**, since Defendants have not filed an Answer to the Amended Complaint, Plaintiff has no knowledge of what claims or defenses that Defendants will raise. Without knowledge of Defendants claims and defenses it is incredibly difficult for Plaintiff to conduct meaningful discovery. This Court should set a deadline for Defendants to Answer the Amended Complaint, so that when Plaintiff is making her new discovery requests, she knows what claims and defenses will be raised from the newly filed answer. **Second**, Plaintiff need to wait to see what supplemental initial disclosures Defendants will provide based upon the Amended Complaint. This Court set the deadline for initial disclosures on May 18, 2018 in its Order Setting Trial Date & Related Dates, in Docket 73. Plaintiff will need to wait until at least May 18, 2018 to compile and serve its new discovery requests. **Third**, the current deadline for filing motions related to discovery on June 06, 2018, as set in Docket 73, is premature because with

1 before Plaintiff knows whether Defendants answers are adequate.

2 The proposed dates for the new discovery requests will be as follows:

3 Supplemental Initial Disclosures (as needed): May 18, 2018.

4  
5 [Proposed Date] First Set of Interrogatories and Requests for Production of Documents  
6 must be served by: June 06, 2018.

7 [Proposed Date] Deadline for completing discovery: July 06, 2018.

8 [Proposed Date] Deadline for filing motions related to discovery: August 06, 2018.

9  
10 Dated: May 09, 2018

11  
12 LAW OFFICE OF JOSEPH THOMAS, PLLC

13  
14 By: /s/ Joseph Thomas

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**Certificate of Service**

I hereby certify that on 09 of May, 2018, I filed the foregoing with the Clerk of the Court through the CM/ECF system which will automatically send electronic mail notification of such filing to the CM/ECF registered participants as identified on the Electronic Email Notice List.

/s/ Joseph Thomas

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